

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND
CIVIL DIVISION**

TATIANA CUENCA-VIDARTE, *et al.*

Plaintiffs

VS.

MICHAELE C. SAMUEL and
ADAM ISHAEIK, et al.

Defendants

• • • • •

CIVIL ACTION NO.: 8:20-cv-01885-GJH

**ANSWER OF DEFENDANTS MICHAEL C. SAMUEL AND ADAM ISHAEIK TO
PLAINTIFFS' FIRST AMENDED COMPLAINT AND CROSSCLAIM UNDER
FEDERAL RULE OF CIVIL PROCEDURE 13(g) AGAINST ALL OTHER
DEFENDANTS**

COMES NOW, Defendants MICHAEL C. SAMUEL and ADAM ISHAEIK, by and through counsel, Edward James Leyden and LEYDEN LAW LLC, and Gabriel J. Christian and THE LAW OFFICES OF GABRIEL J. CHRISTIAN & ASSOCIATES, LLC, to submit this Answer to the First Amended Complaint filed by Plaintiffs TATIANA CUENCA-VIDARTE and SANDRA PETERS, and a Crossclaim, under Federal Rule of Civil Procedure (FRCP) 13(g), against Defendants AUPAIRCARE INC., INTERNATIONAL TRAINING AND EXCHANGE, INC., JOHN F. WILHELM, and TAKESHI YOKOTA stating as follows:

ANSWER TO PLAINTIFFS' FIRST AMENDED COMPLAINT

1. Defendants Michael C. Samuel and Adam Ishaiek deny the allegations contained in ¶1 of the Plaintiffs' Complaint.

2. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶2 of the Plaintiffs' Complaint.
3. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶3 of the Plaintiffs' Complaint.
4. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶4 of the Plaintiffs' Complaint.
5. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶5 of the Plaintiffs' Complaint.
6. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶6 of the Plaintiffs' Complaint.
7. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶7 of the Plaintiffs' Complaint.
8. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶8 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
9. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶9 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
10. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶10 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
11. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶11 of the Plaintiffs' Complaint.

12. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶14 of the Plaintiffs' Complaint.
13. Defendants Michaele C. Samuel and Adam Ishaeik admit the allegations contained in ¶13 of the Plaintiffs' Complaint.
14. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶14 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
15. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶15 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
16. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶16 of the Plaintiffs' Complaint.
17. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶17 of the Plaintiffs' Complaint.
18. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶18 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
19. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶19 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
20. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶20 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

21. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶21 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
22. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶22 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
23. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶23 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
24. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶24 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
25. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶25 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
26. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶26 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
27. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶27 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

28. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶28 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
29. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶29 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
30. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶30 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
31. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶31 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
32. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶32 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
33. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶33 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
34. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶34 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

35. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶35 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
36. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶36 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
37. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶37 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
38. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶38 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
39. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶39 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
40. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶40 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
41. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶41 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

42. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶42 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
43. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶43 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
44. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶44 of the Plaintiffs' Complaint.
45. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶45 of the Plaintiffs' Complaint.
46. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶46 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
47. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶47 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
48. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶48 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
49. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶49 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
50. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶50 of the Plaintiffs' Complaint.

51. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶51 of the Plaintiffs' Complaint.
52. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶52 of the Plaintiffs' Complaint.
53. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶53 of the Plaintiffs' Complaint.
54. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶54 of the Plaintiffs' Complaint.
55. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶55 of the Plaintiffs' Complaint.
56. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶56 of the Plaintiffs' Complaint.
57. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶57 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
58. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶58 of the Plaintiffs' Complaint.
59. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶59 of the Plaintiffs' Complaint.
60. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶50 of the Plaintiffs' Complaint.
61. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶61 of the Plaintiffs' Complaint.

62. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶62 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
63. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶63 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
64. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶64 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
65. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶65 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
66. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶66 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
67. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶67 of the Plaintiffs' Complaint.
68. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶68 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
69. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶69 of the Plaintiffs' Complaint.
70. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶70 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
71. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶71 of the Plaintiffs' Complaint.

72. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶72 of the Plaintiffs' Complaint.

73. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶73 of the Plaintiffs' Complaint.

74. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶74 of the Plaintiffs' Complaint.

75. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶75 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

76. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶76 of the Plaintiffs' Complaint.

77. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶77 of the Plaintiffs' Complaint.

78. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶78 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

79. Defendants Michaele C. Samuel and Adam Ishaeik the allegations contained in ¶79 of the Plaintiffs' Complaint.

80. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶80 of the Plaintiffs' Complaint.

81. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶81 of the Plaintiffs' Complaint.

82. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶82 of the Plaintiffs' Complaint.

83. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶47 of the Plaintiffs' Complaint.

84. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶84 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

85. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶85 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

86. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶86 of the Plaintiffs' Complaint.

87. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶87 of the Plaintiffs' Complaint.

88. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶88 of the Plaintiffs' Complaint.

89. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶89 of the Plaintiffs' Complaint.

90. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶90 of the Plaintiffs' Complaint.

91. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶91 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

92. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶92 of the Plaintiffs' Complaint.

93. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶93 of the Plaintiffs' Complaint.
94. Defendants Michaele C. Samuel and Adam Ishaeik the allegations contained in ¶94 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
95. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶95 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
96. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶96 of the Plaintiffs' Complaint.
97. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶97 of the Plaintiffs' Complaint.
98. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶98 of the Plaintiffs' Complaint.
99. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶99 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
100. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶100 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
101. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶101 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
102. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶102 of the Plaintiffs' Complaint.

103. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶103 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
104. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶104 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
105. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶105 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
106. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶106 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
107. Defendants Michael C. Samuel and Adam Ishaik lack knowledge sufficient to admit or deny the allegations contained in ¶108 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
108. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶109 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
109. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶110 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
110. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶111 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
111. Defendants Michael C. Samuel and Adam Ishaik deny the allegations contained in ¶112 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

112. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶113 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
113. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶114 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
114. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶115 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
115. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶116 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
116. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶117 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
117. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶119 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
118. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶120 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
119. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶121 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

120. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶122 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
121. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶123 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
122. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶124 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
123. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶125 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
124. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶126 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
125. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶127 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
126. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶128 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
127. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶130 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
128. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶131 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

129. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶132 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
130. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶133 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
131. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶134 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
132. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶136 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
133. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶137 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
134. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶138 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
135. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶139 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
136. Defendants Michaele C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶140 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
137. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶142 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

138. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶143 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
139. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶144 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
140. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶145 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
141. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶146 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
142. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶147 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
143. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶148 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
144. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶149 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
145. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶150 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
146. Defendants Michaele C. Samuel and Adam Ishaeik deny the allegations contained in ¶151 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.
147. Defendants Michaele C. Samuel and Adam Ishaeik admit the allegations contained in ¶152 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

148. Defendants Michael C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶153 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

149. Defendants Michael C. Samuel and Adam Ishaeik lack knowledge sufficient to admit or deny the allegations contained in ¶154 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

150. Defendants Michael C. Samuel and Adam Ishaeik deny the allegations contained in ¶155 of the Plaintiffs' Complaint, which, moreover, calls for legal conclusions.

AFFIRMATIVE DEFENSES

In addition to the foregoing, the Defendants, Michael C. Samuel and Adam Ishaeik, do exercise and assert the following defenses:

1. The Plaintiffs' First Amended Complaint fails to state a claim upon which relief can be granted.
2. Statute of Limitations and/or the Doctrine of Laches;
3. Assumption of Risk;
4. Contributory Negligence;
5. Anticipatory Breach of Contract;
6. Unclean Hands;
7. Collateral Estoppel and/or Res Judicata; and/or
8. Any and all other defenses available under law and/or equity.

WHEREFORE, the Defendants, Michael C. Samuel and Adam Ishaeik, do hereby respectfully request that the Plaintiffs' First Amended Complaint be dismissed, with prejudice, for judgment on their behalf, attorneys' fees, costs, interest, and any and all other relief that this Court may grant.

CROSSCLAIM UNDER FEDERAL RULE OF CIVIL PROCEDURE
(FRCP) 13(g) AGAINST ALL OTHER DEFENDANTS

In addition to the foregoing, the Defendants/Crossplaintiffs, Michael C. Samuel and Adam Ishaeik, pursuant to FRCP 13(g), do hereby bring this crossclaim seeking Indemnification and Contribution from all of the other Defendants, *namely*, Aupaircare Inc., International Training and Exchange, Inc., John F. Wilhelm, and Takeshi Yokota, stating as follows:

1. Defendants/Crossplaintiffs Michael C. Samuel and Adam Ishaeik are residents of the State of Maryland.
2. Each and all of the other Defendants engaged in commercial activity involving the Defendants/Crossplaintiffs in the State of Maryland.
3. Defendants/Crossplaintiffs Michael C. Samuel and Adam Ishaeik have been named in the instant lawsuit in this Court by Plaintiffs Tatiana Cuenca-Vidarte and Sandra Peters, claiming compensatory, liquidated, and punitive damages for violations of federal and/or state laws addressing wage and hour requirement, breach of contract, and human trafficking
4. Defendants/Crossplaintiffs Michael C. Samuel and Adam Ishaeik have specifically denied the allegations against them by Plaintiffs Cuenca-Vidarte and Sandra Peters.
5. Furthermore, in all of their interactions with the Plaintiffs, Defendants/Crossplaintiffs relied expressly and specifically on the representations of the Crossclaim Defendants in connection with all relevant matters, especially as regard to the legal requirements of the U.S. Department of State's J-1 program in coordination with all applicable wage and hours laws.

6. Accordingly, if Defenants/Crossplaintiffs Michael C. Samuel and Adam Ishaeik are found liable to Plaintiffs Tatiana Cuenca-Vidarte and Sandra Peters through judgment, settlement, or otherwise, then their liability is caused by the acts of the each and all of the Crossclaim Defendants.
7. Defenants/Crossplaintiffs Michael C. Samuel and Adam Ishaeik are, therefore, entitled to contribution and/or indemnification from each and all of the Crossclaim Defendants for all sums which they pay or are adjudged liable to pay through settlement, judgment, or otherwise, as well as all attorneys' fees and costs they incur.

WHEREFORE, the Defendants/Crossplaintiffs, Michael C. Samuel and Adam Ishaeik, do hereby respectfully request judgment for indemnity and/or contribution from each and all of the Crossclaim Defendants, *namely*, Aupaircare Inc., International Training and Exchange, Inc., John F. Wilhelm, and Takeshi Yokota for all sums which they pay or are adjudged liable to pay thorough settlement, judgment, or otherwise, as well as for all attorneys' fees and costs they incur

July 24, 2020

Respectfully submitted,

/s/ Edward James Leyden
Edward James Leyden
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*Counsel for Defendants Michael C.
Samuel and Adam Ishaeik*

/s/ Gabriel J. Christian

Gabriel J. Christian

District of MD Bar No.: 09584

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301.218.9405 (facsimile)

gabriel@gclawmd.com

Counsel for Defendants Michaele C.

Samuel and Adam Ishaeik

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing “Answer to Plaintiffs’ First Amended Complaint” was filed and served via the Court’s NextGen service, this 24th day of July 2020.

S/Edward James Leyden

Edward James Leyden